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November 4, 2020

In re Novartis and Par Antitrust Litigation, 1:18-cv-04361-AKH

Dear Judge Hellerstein:

Pursuant to Rule 4.A and 4.B.ii of Your Honor's Individual Rules of Practice, Paragraph 19 of the Stipulated Protective Order (ECF No. 95) and applicable law, I write on behalf of Novartis Pharmaceuticals Corporation and Novartis AG (together, "Novartis") requesting permission to file under seal certain portions of Plaintiffs' Reply Memorandum of Law in Support of Plaintiffs' Rule 37 Motion to Compel Novartis to Designate a 30(b)(6) Witness ("Plaintiffs' Reply") (ECF No. 300). Novartis has conferred with Plaintiffs and they take no position on whether or not the document should be sealed.

On October 26, 2020, Novartis filed a letter motion to seal portions of Plaintiffs' Rule 37 Motion to Compel Novartis to Designate a 30(b)(6) Witness ("Motion to Compel"), Novartis' Opposition to the Motion to Compel, and certain exhibits to both briefs because they quoted from or related to two confidential settlement and license agreements regarding Lotrel and another Novartis product. (ECF No. 292). This Court granted that motion on October 28, 2020 (ECF No. 302). Plaintiffs' Reply was filed under seal the same day and includes portions that relate to one of those confidential settlement and license agreements. Therefore, for the same reasons set forth in Novartis's October 26, 2020 letter motion, Plaintiffs' Reply should remain sealed in part. Novartis has filed the document with appropriate redactions.

Novartis is available at the Court's convenience should Your Honor have any questions or wish to discuss this request.

Very truly yours,

/s/ Julie A. North

Julie A. North

So ordered.

The Clerk is directed to spread this order
to all cases. /s/ Alvin K. Hellerstein

November 6, 2020

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

BY ECF